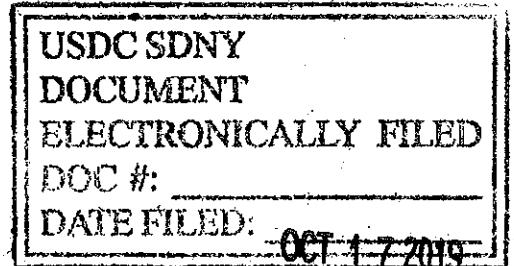


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -	x	
	:	
UNITED STATES OF AMERICA	:	<u>SUPERSEDING</u>
	:	<u>INFORMATION</u>
- v. -	:	
	:	S2 18 Cr. 530 (LGS)
NAZEER VICKERS,	:	
a/k/a "Z,"	:	
	:	
Defendant.	:	
- - - - -	x	

COUNT ONE

(Sex Trafficking Conspiracy)



1. From in or about June 2017, up to and including in or about August 2017, within the Southern District of New York and elsewhere, NAZEER VICKERS, a/k/a "Z," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit sex trafficking, in violation of Title 18, United States Code, Sections 1591(a)(1) and (a)(2).

2. It was a part and an object of the conspiracy that NAZEER VICKERS, a/k/a "Z," the defendant, and others known and unknown, would and did, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit, by any means persons, and did benefit, financially and by receiving things of value, from participation in a venture

which engaged in any such act, knowing and in reckless disregard of the fact that one and more such persons had not attained the age of 18 years and would be caused to engage in one and more commercial sex acts.

(Title 18, United States Code, Section 1594(c).)

FORFEITURE ALLEGATIONS

3. As a result of committing the offense alleged in Count One of this Information, NAZEER VICKERS, a/k/a "Z," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d), any property, real and personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of the offense alleged in Count One, and any property, real and personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offense alleged in Count One, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense that the defendant personally obtained.

Substitute Asset Provision

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;


(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 1594;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

NAZEER VICKERS,
a/k/a "Z,"

Defendant.

SUPERSEDING
INFORMATION

S2 18 Cr. 530 (LGS)

(18 U.S.C. § 1594(c))

GEOFFREY S. BERMAN
United States Attorney
